III. REMARKS

Claims 1-22 are pending in this application. By this amendment, claims 1, 7, 11, 14, 15 and 18 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-22 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Goldberg *et al.* (U.S. Patent No. 6,496,833), hereafter "Goldberg." Applicants respectfully traverse this rejection for the following reasons.

With regard to the 35 U.S.C. §102(e) rejection over Goldberg, Applicants assert that Goldberg does not teach each and every feature of the claimed invention. For example, with respect to claims 1, 6, 14-15 and 18, Applicants respectfully submit that Goldberg does not disclose, *inter alia*, "[a] generator dictionary comprising at least one logical generator and at least one physical code generator[,] ... wherein the at least one logical generator calls the at least one physical code generator to generate source code," as recited in claim 1 and claimed similarly in claims 6, 14-15 and 18. Goldberg discloses code generator classes that are arranged in a class hierarchy with subclasses that depend on the implementation language and the underlying DBMS

language. Col. 12, lines 14-17. Each code generator object "is actually used to generate specific query object source code[.]" Col. 12, lines 10-12. The root QueryObjectImplGenerator class of Goldberg generates IDL interface, a test script file, a test client, and source code for test GUI. Col. 12, lines 52-57. Likewise, the root class in Goldberg may have one or more child classes in the class hierarchy that are each used to generate code "...which is tailored for a specific implementation language." Col. 12, lines 62-64. Further, a language dependent child class of Goldberg may have one or more child classes of its own that generate code based on the particular DBMS API. Col. 13, lines 12-13. In short, as stated above, all of the generator classes in Goldberg generate code. Accordingly, none of the generator classes is a logical generator as all are physical generators. Nowhere in Goldberg is there any disclosure of a generator dictionary having at least one logical generator that calls at least one physical code generator to generate source code. In contrast, the claimed invention includes "[a] generator dictionary comprising at least one logical generator and at least one physical code generator[,] ... wherein the at least one logical generator calls the at least one physical code generator to generate source code." Claim 1. As such, the generator dictionary as included in the claimed invention does not only include physical code generators as in Goldberg, but also includes at least one logical code generator, i.e., a generator that does not actually generate code itself. Thus, the generator class in the class hierarchy of Goldberg is not equivalent to the generator dictionary comprising at least one logical generator and at least one physical code generator as included in the claimed invention. In view of the foregoing, Applicants respectfully submit that Goldberg fails to teach each and every feature of the claimed invention. Accordingly, withdrawal of the above-cited rejections is requested.

With further respect to independent claims 1, 11, 14, 15 and 18, and with respect to dependent claim 7, Applicants respectfully submit that Goldberg also fails to teach a user amendable generator dictionary. As stated above, Goldberg teaches a hierarchy of generator classes that are used to generate code. Col. 12, lines 9-14. Goldberg, however, does not teach that the generator classes are amendable. Nowhere does Goldberg teach a user amendable generator dictionary. The present invention, in contrast, includes "...a user amendable generator dictionary." Claim 1. As such, in the current invention, a user may amend the generator dictionary. For the above reasons, the hierarchy of generator classes of Goldberg is not equivalent to the user amendable generator as included in the present invention. Accordingly, Applicants request that the rejection be withdrawn.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

Date: November 22, 2004

Ronald A. D'Alessandro
Reg. No.: 42,456

Hoffman, Warnick & D'Alessandro LLC
Three E-Comm Square
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)